

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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THOMAS M. MORAN,

Plaintiff,

- against -

19-cv-3079 (AT)(KHP)

MTA METRO-NORTH RAILROAD COMPANY,
PO NICHOLAS STRYPE (individual capacity),
PO DOUGLAS COHEN (individual capacity), PO LUIGI
SEIDITA (individual capacity), PO JASON NANDOO
(individual capacity), PO JOSEPH TERACCiano
(individual capacity), and PO RICHARD DOE (Full names
and number of whom are unknown at present, and other
unidentified members of the MTA Police Department in
their individual capacities),

**DECLARATION OF
STEVE S. EFRON**

Defendants.
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Steve S. Efron, an attorney admitted to practice in the United States District Court for the Southern District of New York, declares the following under the penalties of perjury:

The documents identified below are being submitted in opposition to plaintiff's motion for attorneys' fees and costs.

1. Annexed as Exhibit A is a spreadsheet showing time expended by Cahill conducting depositions and travel time (data extracted from plaintiff's submissions).

2. Annexed as Exhibit B is a spreadsheet showing all Cahill time entries of one-tenth of a minute (data extracted from plaintiff's submissions).

3. Annexed as Exhibit C is a spreadsheet showing Perry's expenditure of time researching § 1983 issues (data extracted from plaintiff's submissions).

Dated: New York, New York
August 7, 2023

/s/
Steve S. Efron